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7 *Attorneys for Defendant Rob Bonta, in his official*  
8 *capacity as Attorney General of California*

9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
11 WESTERN DIVISION  
12

13 **MINDS, INC., et al.,**

14 Plaintiffs,

15 v.

16  
17 **ROBERT BONTA, IN HIS**  
**OFFICIAL CAPACITY AS**  
18 **ATTORNEY GENERAL OF**  
19 **CALIFORNIA,**

20 Defendant.

2:23-cv-02705- RGK-MAAx

**DEFENDANT'S NOTICE OF  
MOTION AND MOTION TO  
DISMISS AMENDED  
COMPLAINT**

Date: June 26, 2023  
Time: 9:00 am  
Courtroom: 10B  
Judge: The Honorable R. Gary  
Klausner  
Trial Date: None set  
Action Filed: April 13, 2023

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22  
23 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

24 PLEASE TAKE NOTICE THAT at 9:00 a.m. on June 26, 2023, before the  
25 Honorable R. Gary Klausner, First Street Courthouse, Courtroom 10B, 350 W. First  
26 Street, Los Angeles, CA 90012, Defendant Rob Bonta, in his official capacity as  
27 Attorney General of the State of California, will and hereby does move this Court  
28 to dismiss without leave to amend Plaintiffs' Amended Complaint for Declaratory

1 and Injunctive Relief pursuant to Federal Rules of Civil Procedure 12(b)(1) and  
2 12(b)(6). **This motion is made following the conference of counsel that took**  
3 **place on May 18, 2023.**

4 This motion to dismiss is brought on the grounds that Plaintiffs lack standing  
5 and their claims are not ripe, and the Amended Complaint fails to state a claim as a  
6 matter of law and cannot be cured by amendment. This motion is based on this  
7 Notice, the Memorandum of Points and Authorities, the Request for Judicial  
8 Notice, the papers and pleadings on file in this action, and upon such matters as  
9 may be presented to the Court at the time of the hearing.

10 Dated: May 25, 2023

Respectfully submitted,

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12 ROB BONTA  
Attorney General of California  
13 PAUL STEIN  
Supervising Deputy Attorney General

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15 /s/ Sharon L. O'Grady  
SHARON L. O'GRADY  
16 Deputy Attorney General  
17 *Attorneys for Defendant Rob Bonta,*  
*in his official capacity as Attorney*  
18 *General of California*

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## CERTIFICATE OF SERVICE

Case Name: **Minds, Inc., et al. v. Robert  
Bonta**

No. **2:23-cv-02705- RGK-MAAx**

I hereby certify that on May 25, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

- **DEFENDANT’S NOTICE OF MOTION AND MOTION TO DISMISS AMENDED COMPLAINT**
- **MEMORANDUM IN SUPPORT OF DEFENDANT’S MOTION TO DISMISS AMENDED COMPLAINT WITH APPENDIX**
- **REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANT’S MOTION TO DISMISS AMENDED COMPLAINT WITH EXHIBITS 1-6**
- **[PROPOSED] ORDER GRANTING DEFENDANT’S MOTION TO DISMISS AMENDED COMPLAINT**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on May 25, 2023, at San Francisco, California.

K. Figueroa-Lee  
Declarant

  
Signature